

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

PROTECT OUR PARKS, INC., et al.,	)	
	)	
Plaintiffs,	)	
	)	
v.	)	No. 21-cv-2006
	)	
PETE BUTTIGIEG,	)	Hon. John Robert Blakey
SECRETARY OF THE U.S. DEPARTMENT	)	
OF TRANSPORTATION, et al.,	)	
	)	
Defendants.	)	

**PLAINTIFFS' NOTICE OF MOTION**

Please take notice that on Thursday, August 26, 2021, at 11:00 a.m., the undersigned will appear before the Honorable John Robert Blakey, or any judge sitting in his stead, in Courtroom 1203 of the U.S. District Court for the Northern District of Illinois, Eastern Division, and present **Plaintiffs' Motion to File Brief in Excess of Fifteen Pages.**

Dated: July 30, 2021

Protect Our Parks, Inc.; Nichols Park Advisory  
Council; Stephanie Franklin; Sid E. Williams;  
Bren E. Sheriff; W.J.T. Mitchell; and Jamie Kalven

By: /s/ Michael Rachlis  
One of their attorneys

Richard Epstein  
16 Thomas Place  
Norwalk CT 06853  
[Raepstein43@gmail.com](mailto:Raepstein43@gmail.com)

Michael Rachlis (IL Bar No. 6203745)  
Rachlis Duff & Peel, LLC  
542 South Dearborn Street, Suite 900  
Chicago, Illinois 60605  
(312) 733-3950 (gen.)  
(312) 733-3952 (fax)  
[mrachlis@rdaplawn.net](mailto:mrachlis@rdaplawn.net)

**CERTIFICATE OF SERVICE**

I hereby certify that on July 30, 2021, I electronically filed the foregoing **Notice and Plaintiffs' Motion to File Brief in Excess of Fifteen Pages** with the Clerk of the United States District Court for the Northern District of Illinois, using the CM/ECF system. Copies of the foregoing pleadings were served upon counsel of record via the CM/ECF system.

/s/ Michael Rachlis

Rachlis Duff & Peel, LLC  
542 South Dearborn Street, Suite 900  
Chicago, IL 60605  
Phone (312) 733-3950  
Fax (312) 733-3952  
mrachlis@rdaplawn.net